



Department of Energy

Ohio Field Office

Fernald Area Office

P. O. Box 538705

Cincinnati, Ohio 45253-8705

(513) 648-3155



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Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

3-209.

Dear Mr. Saric:

**CHANGE PAGES ADDRESSING THE U.S. ENVIRONMENTAL PROTECTION AGENCY'S
COMMENTS TO THE OPERABLE UNIT 3 INTEGRATED REMEDIAL DESIGN/REMEDIAL
ACTION WORK PLAN**

**Reference: Letter, J. Saric to J. Reising, "OU3 Integrated RD/RA Work Plan," dated
April 24, 1997.**

The purpose of this letter is to transmit the change pages necessary to resolve the two comments made by the U.S. Environmental Protection Agency (U.S. EPA) in the April 24, 1997, letter referenced above. The content of the work plan changes reflect verbal clarification between yourself and Mr. Terry Hagen on April 29, 1997, regarding the U.S. EPA comments.

The two U.S. EPA comments and the Department of Energy (DOE) responses are provided on Page 1 of the enclosure and the two affected pages of the work plan follow. The text changes (additions) are shown in redlined text. Upon your approval of these changes to the Operable Unit 3 (OU3) RD/RA Work Plan, a finalized version will be submitted to your office.

If you or your staff have any questions, please contact John Trygier at (513) 648-3154.

Sincerely,

Johnny W. Reising

Johnny W. Reising
Fernald Remedial
Project Manager

FEMP:Trygier

Enclosures: As Stated

cc w/encs:

N. Hallein, EM-42/CLOV
J. Hall, DOE-FEMP
G. Jablonowski, USEPA-V, 5HRE-8J
R. Beaumier, TPSS/DERR, OEPA-Columbus
T. Schneider, OEPA-Dayton
F. Bell, ATSDR
D. S. Ward, GeoTrans
R. Vandegrift, ODOH
R. Geiger, PRC
P. Courtney, FDF/44
T. Hagen, FDF/65-2
J. Harmon, FDF/90
AR Coordinator, FDF/78

cc w/o encs:

C. Little, FDF/2
EDC, FDF/52-7

**RESPONSES TO U.S. EPA COMMENTS ON THE DRAFT FINAL REVISIONS
TO THE OU3 INTEGRATED RD/RA WORK PLAN**

U.S. EPA Comment

The project completion report for each complex decontamination and dismantlement project should include a SWIFTS database report providing a status update on OU3 material management. The RD/RA work plan must be revised to address this issue.

DOE Response

Agree. A bullet was added to Section 4.5 (see page 4-29) to add this requirement to D&D project reporting. The SWIFTS report will summarize the status of materials generated from that particular project.

U.S. EPA Comment

U.S. DOE should provide a PSAP in the project implementation plan for each complex, and should revise the RD/RA work plan to clarify this issue.

DOE Response

Agree. A bullet was added to Section 4.1.5 (see page 4-15) to require that any PSAPs prepared during design would be inc

Each project completion report will summarize the following information for an above-grade decontamination and dismantlement project:

- reiteration of remediation activities defined in the project-specific implementation plan and a statement indicating their performance in accordance with project specifications;
- substantive deviations to project performance specifications that impacted remediation strategies;
- HWMU remediation activities per the DF&O;
- identification of materials that have or will be treated and disposition locations for materials listed in the MSCC;
- project-specific material management information, which will be summarized in a SWIFTS report;
- description of any alternative technologies used or evaluated during the project, including those being used or pursued to execute recycling or disposition options;
- summary of results from project-specific environmental monitoring activities; and
- explanations of any modifications to this work plan and/or implementation plan, and the reasons these were necessary for the project.

The removal actions adopted into the scope of the OU3 integrated remedial action will require a form of reporting to programmatically close-out those actions as they apply to above-grade decontamination and dismantlement. Since applications of decisions and procedures adopted from removal actions may be used during at- and below-grade remediation (e.g., Removal Action 9 for management of any product, residues, or special materials), amendments to removal action close-out reports would be included as elements to remedial action reporting for the SCEP. Applicable elements of removal action close-out reporting outlined under 40 CFR 300.165 will be documented in individual close-out reports unless the timing is such that removal action completion coincides with the overall completion of OU3 remedial action, whereupon such reporting would be included in the OU3 Final Remedial Action Report.

D subsections which describe the component-specific remediation approach for each of the components in the project, including requirements for each of the remediation tasks that were not defined in Section 3.2 of this work plan. This section will discuss in particular, materials removed during inventory removal and safe shutdown, any details regarding HWMU remediation, friable asbestos removal, alternative technologies to be applied to surface decontamination and above-grade dismantlement, and references to applicable performance specifications;

- reporting on any alternative technologies (including D&D and recycling) in the implementation plan;
- a schedule for implementation and deliverables which will include the three enforceable milestones: 1) Notice to Proceed; 2) Completion of Field Activities; and 3) Submittal of the Project Completion Report to U.S. EPA and Ohio EPA; and supplemental (non-enforceable) information will also be included in the remediation schedule which identifies the subcontract award date and projected durations for field activities and document preparation;
- a section describing how the project will be managed; and
- appendices which contain any project-specific SAPs prepared during design, a listing of the performance specifications, selected design drawings, and photographs.

4.2 Decontamination and Dismantlement

This section describes the activities that will be performed by the FEMP construction manager and subcontractors to implement and manage the remedial action, including: subcontractor procurement, execution of work, oversight activities, and documentation and certification of action. The following discussions detail the scope of work and oversight and inspection processes.

4.2.1 Remediation Subcontractor Procurement

The remediation subcontractor procurement begins during the preliminary stage of each project design for above-grade decontamination and dismantlement. At that time, a contracting strategy will be developed that considers optional approaches, potential number and scope of contracts, contract types, and contracting procedures. The number and scope of contracts will be dependent on the complexity of each project and funding availability. The method for